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State of Nevada ex rel.
Nevada Gaming Control Board*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JAIME BLACK,

Plaintiff,

vs.

STATE OF NEVADA, ex rel. NEVADA
GAMING CONTROL BOARD

Defendant(s).

Case No. 3:24-CV-00414-MMD-CSD

**ORDER GRANTING DEFENDANT'S
UPOPOSED MOTION FOR
ENLARGEMENT OF TIME TO
RESPOND TO FIRST AMENDED
COMPLAINT**

(First Request)

MEMORANDUM OF POINTS AND AUTHORITIES

I. FACTUAL AND PROCEDURAL HISTORY

Plaintiff Jamie Black ("Plaintiff" or "Ms. Black") filed her First Amended Complaint on April 10, 2025. Therein, she made multiple new factual allegations and changes to her previously asserted causes of action. Defendant's response to the First Amended Complaint is currently due Thursday, April 24, 2025. Undersigned counsel has been diligently working with past and current members of Defendant Nevada Gaming Control Board to investigate these allegations. Additionally, in the two weeks that has passed since the First Amended Complaint, undersigned counsel has been responsible for attending seven (7) previously

1 scheduled depositions in Reno and Las Vegas in two separate matters, which also included
2 preparation of three deponents, along with responsibilities in other matters. Defendants do
3 not seek any unmeritorious delay or do so in bad faith.

4 Earlier today, undersigned counsel for Defendant contacted counsel for Plaintiff,
5 who graciously agreed to enter a stipulation for up to ten (10) additional days in which
6 Defendant could respond to the First Amended Complaint. Defendant's counsel sent a
7 proposed stipulation for a six (6) day extension, however Plaintiff's counsel was unavailable
8 to review the stipulation and provide authorization for his signature. Defendant's counsel
9 believes that the instant motion is not opposed based upon those communications.

10 **II. ARGUMENT**

11 FED. R. CIV. P. 6(b) provides:

12 (1) In General. When an act may or must be done within a
13 specified time, the court may, for good cause, extend the time:

14 (A) with or without motion or notice if the court acts, or if a request
15 is made, before the original time or its extension expires; or

16 (B) on motion made after the time has expired if the party failed to
17 act because of excusable neglect.

18 (2) Exceptions. A court must not extend the time to act under
19 Rules 50(b) and (d), 52(b), 59(b), (d) and (e), and 60(b), except as
those rules allow.

20 LR 6-1 provides:

21 (a) Every motion requesting a continuance, extension of time, or
22 order shortening time shall be "Filed" by the clerk and processed
as an expedited matter. . . .

23 (b) Every motion or stipulation to extend time shall inform the court
24 of any previous extensions granted and state the reasons for the
25 extension requested. . . Immediately below the title of such motion
or stipulation there shall be included a statement indicating
whether it is the first, second, third, etc., requested extension. . . .

26 (c) The court may set aside any extension obtained in
27 contravention of this rule.

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1 (d) A stipulation or motion seeking to extend the time to file an
2 opposition or final reply to a motion, or to extend the time fixed for
3 hearing a motion, must state in its opening paragraph the filing
4 date of the motion.

5 Rule 6(b)(1) allows for a party to move for an enlargement of time, the determination
6 of which lies with the presiding court. "The Court has inherent power and discretion to
7 control its docket, and the proceedings within the cases on its docket." *Ford v. County of*
8 *Missoula, Mont.*, 2010 WL 2674036, 1 (D. Mont., 2010) (citing *Landis v. North American*
9 *Co.*, 299 U.S. 248, 254 (1936); *See also* FED. R. CIV.P. 6(b) (advisory committee note, 1946)
10 ("Rule 6(b) is a rule of general application giving wide discretion to the court to enlarge
11 these time limits or revive them after they have expired . . .").

12 Here, good cause exists for an additional six (6) days in order for Defendant to
13 complete its response to the First Amended Complaint as well as to provide some time for
14 client review and approval. As stated above, Plaintiff's First Amended Complaint has
15 differences in her causes of action as well as additional factual allegations which required
16 investigation. At the same time, undersigned counsel was tasked with other matters which
17 included seven (7) depositions in two separate cases in Reno and Las Vegas, and also was
18 required to prepare three of the deponents for their testimony, in addition to other case
19 responsibilities. Moreover, the Complex Litigation is currently understaffed as a Senior
20 Deputy Attorney General is currently on extended leave. Undersigned counsel has worked
21 diligently in responding to the First Amended Complaint, however it could not be completed
22 on time. Thus, Defendant seeks a short extension and not for the purposes of delay and
23 does so in good faith. Defendant has no reason to believe that any additional time will be
24 necessary beyond what is sought in the instant Motion. Finally, Plaintiff appears to have
25 no opposition to the extension and will not be prejudiced by the requested extension.

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1 **III. CONCLUSION**

2 Based upon the foregoing, the Defendants request a six-day extension of time to
3 respond to Plaintiff's First Amended Complaint, to Wednesday, April 30, 2025.

4 DATED this 24th day of April, 2024.

5 AARON D. FORD
6 Attorney General

7 By: /s/ Kyle Hoyt
8 KYLE J. HOYT (Bar No. 14886)
9 Senior Deputy Attorney General
Sabrena K. Clinton (Bar No. 6499)
Senior Deputy Attorney General

10 *Attorneys for Defendant,*
11 *State of Nevada ex rel.*
12 *Nevada Gaming Control Board*

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15 **ORDER**

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17 IT IS SO ORDERED.
18 Dated: April 25, 2025.

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UNITED STATES MAGISTRATE JUDGE